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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

NATHANIEL WOODS, JR.,
Plaintiff,

v.

BAYER HEALTHCARE, Biological Products
Division, a for profit business entity,
Defendant.

CASE NO. C-05-02871 JSW

**STIPULATION AND ~~[PROPOSED]~~ ORDER
REGARDING DISCOVERY AND
DISPOSITIVE MOTION SCHEDULE**

TRIAL DATE: None Assigned

Hon. Jeffrey S. White

WHEREAS, the matters *Jones v. Bayer*, case no. C-03-05531 JSW, and *Dove v. Bayer*, case No. C-05-02873 JSW, are deemed related to this matter;

WHEREAS, this Court had set the dispositive motion hearing date for this matter on calendar for April 7, 2006, prior to the dispositive motion hearing date in the *Dove* matter, currently set for hearing on March 24, 2006;

WHEREAS, plaintiff Dove's deposition was noticed for January 18th, 2006;

WHEREAS, Dove requested that his deposition be moved to January 27th, 2006;

WHEREAS, plaintiff Jones's deposition was noticed for January 9-10th, 2006;

WHEREAS, plaintiff Jones has requested that his deposition be pushed back to January 18-19th, 2006;

WHEREAS, the dispositive motion in this matter should be heard after the dispositive motions in the *Jones* and the *Dove* matters because there are more complexities in this matter;

WHEREAS, contemporaneous stipulations and [proposed] orders on the *Jones* and *Dove* matters are filed herewith to accommodate the continuances of depositions requested by the respective plaintiffs without prejudicing Bayer and its ability to complete discovery in a timely fashion and to have a full and complete hearing on its dispositive motions;

WHEREAS, plaintiff, on the one hand, and Bayer, on the other hand, are collectively adverse, they agree through their respective counsel and stipulate as follows:

1. The hearing on the dispositive motion(s) will now take place on April 21, 2006; and
2. Close of non-expert discovery: March 13, 2006.

IT IS SO STIPULATED.

DATED: January 13, 2006

MOORE & MOORE

By: /s/
HOWARD MOORE, JR.
Attorneys for Plaintiff

DATED: January 13, 2006

By: /s/
CHARLES STEPHEN RALSTON
Attorney for Plaintiff
NATHANIEL WOODS

DATED: January 13, 2006

THE LOUDERBACK LAW FIRM

By: /s/
JEROME SCHREIBSTEIN
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BAYER HEALTHCARE

